

From: John Josefsberg <josefsberg@HotelLawyers.com>
Sent: Tuesday, August 31, 2021 1:54 PM
To: Altman, Jennifer
Cc: Lapointe, Markenzky; Stephen Zralek; John Josefsberg
Subject: RE: Ramsey Solutions

Jennifer:

We do not object to extending deadlines other than amendment of pleadings, which passed nine months ago. We continue to believe that Marriott's proposed deadlines better track what we understand to be the Court's preference for setting the deadline to file dispositive motions, and then working backwards from there. You may note the discrepancies in Ramsey's motion, or we can do so in Marriott's response. Thank you.

	Ramsey:	Marriott
Motions to Amend Pleadings.	November 12, 2021	N/A; Deadline passed
Fact and Expert Discovery Cut-off	March 18, 2022	March 1, 2022
Daubert Motions	April 15, 2022	April 15, 2022
Mediation deadline	April 22, 2022	April 22, 2022
Dispositive Motions	May 20, 2022	April 1, 2022
Jury Instructions	July 9, 2022	July 9, 2022

John C. Josefsberg
 Partner
 Rudner Law Offices
 12740 Hillcrest Road
 Suite 240
 Dallas, Texas 75230
 (214) 587-0108

From: Altman, Jennifer <jennifer.altman@pillsburylaw.com>
Sent: Tuesday, August 31, 2021 9:08 AM
To: John Josefsberg <josefsberg@HotelLawyers.com>
Cc: Lapointe, Markenzky <markenzky.lapointe@pillsburylaw.com>
Subject: RE: Ramsey Solutions

Our position is that you have agreed to all other deadlines other than amendment of pleadings, which we believe is in bad faith so we are filing a motion to modify the scheduling order including to add amendment of pleadings:

These are the proposed dates:

Motions to Amend Pleadings.	November 12, 2021
Fact and Expert Discovery Cut-off	March 11, 2022

Daubert Motions
Mediation deadline
Dispositive Motions
Jury Instructions

April 15, 2022
April 22, 2022
March 18, 2022
July 9, 2022

From: John Josefsberg <josefsberg@HotelLawyers.com>
Sent: Tuesday, August 31, 2021 10:05 AM
To: Altman, Jennifer <jennifer.altman@pillsburylaw.com>
Cc: Lapointe, Markenzky <markenzky.lapointe@pillsburylaw.com>
Subject: RE: Ramsey Solutions

Jennifer- i just returned from a hearing in Tucson and I had to attend to an unexpected personal matter yesterday. I told you I would get back to you no later than today. Can you please send us your motion so we can let you know our position?

Thank you.

John C. Josefsberg
Partner
Rudner Law Offices
12740 Hillcrest Road
Suite 240
Dallas, Texas 75230
214 587-0108

----- Original message -----

From: "Altman, Jennifer" <jennifer.altman@pillsburylaw.com>
Date: 8/31/21 8:57 AM (GMT-06:00)
To: John Josefsberg <josefsberg@HotelLawyers.com>
Cc: "Lapointe, Markenzky" <markenzky.lapointe@pillsburylaw.com>
Subject: Ramsey Solutions

We will be filing a motion to modify the deadlines including amendment of pleadings. Please advise whether you object to the same. Thanks.

Jennifer Altman | Partner
Pillsbury Winthrop Shaw Pittman LLP
600 Brickell Avenue, Suite 3100 | Miami, FL 33131
t +1.786.913.4880 | m +1.305.606.9778
jennifer.altman@pillsburylaw.com | [website bio](#)

AUSTIN BEIJING HONG KONG HOUSTON LONDON LOS ANGELES MIAMI
NASHVILLE NEW YORK NORTHERN VIRGINIA PALM BEACH SACRAMENTO
SAN DIEGO SAN DIEGO NORTH COUNTY SAN FRANCISCO SHANGHAI
SILICON VALLEY TAIPEI TOKYO WASHINGTON, DC

